

# **EXHIBIT 3**

**IF YOU PURCHASED OCCUPANT SAFETY SYSTEMS IN THE UNITED STATES DIRECTLY FROM AUTOLIV, TAKATA, TOKAI RIKA, TRW OR TOYODA GOSEI FROM JANUARY 1, 2003 THROUGH FEBRUARY 25, 2015 YOUR LEGAL RIGHTS MAY BE AFFECTED BY PROPOSED SETTLEMENTS WITH THE TOYODA GOSEI AND TOKAI RIKA DEFENDANTS**

Proposed settlements totaling \$38 million have been reached in *In re Automotive Parts Antitrust Litigation*, Master File No.12-md-02311, 2:12-cv-00601, 2:16-cv-10002 (E.D. Mich.), with the Toyota Gosei and Tokai Rika Defendants (collectively, the “Settling Defendants”).

**What is the lawsuit about?** This class action is part of coordinated legal proceedings involving Occupant Safety Systems purchased in the United States **directly** from a Defendant (as defined below). These proceedings do not relate to, and have no effect upon, cases involving any other product.

“Occupant Safety Systems,” for purposes of the settlements, are seat belts, airbags, steering wheels or steering systems, safety electronic systems, and related parts and components.

Direct Purchaser Plaintiffs allege that Defendants entered into a conspiracy to suppress and eliminate competition for Occupant Safety Systems by agreeing to fix, maintain, or stabilize prices, rig bids, and allocate the supply of Occupant Safety Systems, in violation of federal antitrust laws. Plaintiffs further allege that as a result of the conspiracy, they and other direct purchasers of Occupant Safety Systems were injured by paying more for those products than they should have paid, and seek recovery of treble damages, together with reimbursement of costs and an award of attorneys’ fees.

You were previously notified of the existence of this class action, the nature of the Plaintiffs’ claims, and settlements with the Autoliv Defendants in the amount of \$35,516,800,

and with the TRW Defendants in the amount of \$6,500,000. Those settlements were approved by the Court in Orders dated January 7, 2015 and July 24, 2015, respectively.

Additional proposed settlements have been reached with the Toyota Gosei Defendants for \$34,000,000, and with the Tokai Rika Defendants for \$4,000,000. These settlements, when added to the Autoliv and TRW settlements, bring the total settlements in this case to \$80,016,800.

Each of the Settling Defendants denies Plaintiffs' allegations and has agreed to settle this matter in order to avoid the expense and burden of further litigation. The Court has not issued any findings or rulings with respect to the merits of Plaintiffs' claims or Defendants' defenses. This is a settlement with the Settling Defendants only.

**Who is included?** The Court has preliminarily approved, and has provisionally certified, Toyota Gosei and Tokai Rika Settlement Classes, which are composed of all individuals and entities who purchased Occupant Safety Systems in the United States directly from any of the following Defendants during the period from January 1, 2003 through February 25, 2015 (the "Class Period"): Autoliv Inc.; Autoliv ASP, Inc.; Autoliv B.V. & Co. KG; Autoliv Japan Ltd.; Takata Corporation; TK Holdings, Inc.; Tokai Rika Co., Ltd.; TRAM, Inc. d/b/a Tokai Rika U.S.A. Inc.; Toyota Gosei Co., Ltd.; Toyota Gosei North America Corporation; TG Missouri Corporation; TRW Automotive Holdings Corp.; and TRW Deutschland Holding GmbH.

A Notice of Proposed Settlement and Claim Form ("Notice") was mailed to potential Toyota Gosei and Tokai Rika Settlement Class members on or about \_\_\_\_\_, 2018. The Notice describes the litigation and options available to Settlement Class members with respect to the Toyota Gosei and Tokai Rika settlements in more detail. If you did not receive

the Notice you may obtain a copy on the internet at [www.autopartsantitrustlitigation.com](http://www.autopartsantitrustlitigation.com), or by calling or writing to any of the following Settlement Class Counsel:

Gregory P. Hansel  
PRETI, FLAHERTY, BELIVEAU  
& PACHIOS LLP  
One City Center, P.O. Box 9546  
Portland, ME 04112-9546  
Telephone: (207) 791-3000

Joseph C. Kohn  
KOHN, SWIFT & GRAF, P.C.  
One South Broad Street, Suite 2100  
Philadelphia, PA 19107  
Telephone: (215) 238-1700

Steven A. Kanner  
FREED KANNER LONDON  
& MILLEN LLC  
2201 Waukegan Road, Suite 130  
Bannockburn, IL 60015  
Telephone: (224) 632-4500

Eugene A. Spector  
SPECTOR ROSEMAN & KODROFF, P.C.  
1818 Market Street, Suite 2500  
Philadelphia, PA 19103  
Telephone: (215) 496-0300

**What does the settlement provide?** Toyoda Gosei and Tokai Rika have agreed to pay a total of \$38,000,000 (the “Toyoda Gosei and Tokai Rika Settlement Fund”) to settle the Class Members’ claims against them. As described in more detail in the Notice, the Toyoda Gosei and Tokai Rika settlements are subject to reduction, and/or rescission, in the event of valid requests for exclusion by Settlement Class members. Also as part of the settlements both Settling Defendants have agreed to provide cooperation.

**Your rights may be affected.** If you are a member of either the Toyoda Gosei or Tokai Rika Settlement Class (defined above) you will automatically remain a member of that Settlement Class unless you elect to be excluded. If you wish to remain in a Settlement Class, you do not need to take any action at this time and your interests will be represented by the Class Representatives and by Settlement Class Counsel. **In order to share in the proceeds of either the Toyoda Gosei or Tokai Rika settlements, however, you must either have previously submitted a valid Claim Form in connection with the Autoliv and TRW settlements, or complete and return a copy of the Claim Form that was recently mailed to potential**

**Settlement Class members along with the Notice, postmarked no later than \_\_\_\_\_, 2018.**

If you wish to exclude yourself from either the Toyoda Gosei or Tokai Rika Settlement Class (or both), you must send a request for exclusion, in writing, by certified mail, return receipt requested, **postmarked no later than \_\_\_\_\_, 2018**, in accordance with the procedures set forth in the Notice. If you validly exclude yourself from either the Toyoda Gosei and Tokai Rika Settlement Class (or both), you will not be bound by any decision concerning that settlement class and you can pursue individually any claims you may have against those Defendants (at your own expense), but you will not be eligible to share in the settlement proceeds attributable to those Defendants.

Any potential Settlement Class Member who requests exclusion from the Toyoda Gosei or Tokai Rika Settlement Class shall not be precluded, restricted, barred or limited in any way from participating in any future settlements relating to other Defendants in the Action.

If you remain a member of either the Toyoda Gosei or Tokai Rika Settlement Class, you have the right to object to that proposed settlement, or to the proposed plan of distribution of the Toyoda Gosei and Tokai Rika Settlement Fund, or to Settlement Class Counsel's requests for an award of attorneys' fees and litigation costs and expenses and incentive awards for the Class Representatives, by following the procedures set forth in the Notice. **Your objection must be filed no later than \_\_\_\_\_, 2018.**

The Court has scheduled a hearing on \_\_\_\_\_, 2018, to consider whether to approve: the proposed settlements; the proposed plan of distribution of settlement funds; and Settlement Class Counsel's requests for an award of attorneys' fees and litigation costs and

expenses and incentive award for the Class Representatives. The hearing may be continued without further notice to you.

If you believe you are a member of either the Toyoda Gosei or Tokai Rika Settlement Class, you are urged to obtain a copy of the Notice, which discusses your rights regarding the settlements and related matters.

If you have questions concerning this litigation, you may contact any one of the Settlement Class Counsel identified above. **Do not contact the Clerk of the Court or the Judge.**

Dated: \_\_\_\_\_, 2018

BY ORDER OF:  
The United States District Court for the Eastern  
District of Michigan, Southern Division